

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CURTIS M. COLLINS,)	
)	
Plaintiff,)	
)	C.A. No. 05-739-SLR
v.)	
)	Jury Trial Requested
WARDEN RICK KEARNEY, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF TIMOTHY MARTIN

I, Timothy Martin, having been duly sworn by law, do hereby depose and state as follows:

1. I am employed by the State of Delaware Department of Correction ("DOC") as a Paralegal II at the Delaware Correctional Center ("DCC"), Smyrna, Delaware. I have been employed by DCC since March 1996, and as a Paralegal II since February 2001.
2. Inmate Curtis Collins, SBI #00314128, has been housed in the Maximum Housing Unit ("MHU"), Building #21 since April 4, 2006. Mr. Collins is not housed in segregation.
3. Because of the security level assigned to Building #21 all legal work is handled through in-house mail service. Although Mr. Collins does not have physical access to the law library or a paralegal, he is permitted to write his requests to the law library staff through institutional mail. His requests are then completed by staff paralegals and inmate workers. Attached as Exhibit "1" is a breakdown of the requests Mr. Collins made to the law library from April 7, 2006 through November 29, 2006.

4. There are various services provided to the inmates through the law library. These services include: court forms for the various courts, photocopying, notary service, case law research and copies of case law and court rules. Attached as Exhibit "2" is a breakdown of the services Mr. Collins received from April 7, 2006 through November 29, 2006.

Timothy J. Martin
Timothy Martin

SWORN AND SUBSCRIBED before me this 1st day of

December, 2006.

Mrs L
Notary